

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** January 19, 2005

**Site Contact(s):** Dyan Foss  
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**Regulatory Contact:** Edd Kray  
**Phone:** (303) 994-3441

**Agency:** CDPHE

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**Purpose of Contact:** Disposition of Second Floor Survey units 28, 33, and 34 and clarification to the disposition of Survey unit 7

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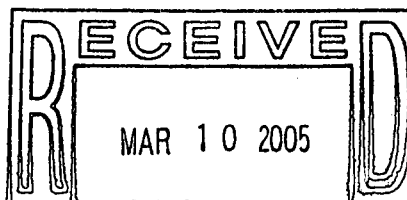
### Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Second floor Survey units 28, 33, and 34 for demolition. Survey unit 28 includes all or portions of rooms 201A, 202, 205A, and 214. Survey unit 33 includes all or portions of rooms 230, 230A, 231, 231A, 232A, 232, 233, 233B, 233A, and 219. Survey unit 34 includes all or portions of rooms 201A, 205B, and 212.

The preparation of survey units 28 and 33 was initiated August 15, 2004 and survey unit 34 was initiated August 12, 2004 when packages for in-process radiological surveys was prepared and executed. Once the surveys were complete, it was determined that the in process and final surveys could be combined into one book for all survey units and the CDPHE representative concurred with this approach. These areas were surveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 28. The following summarizes the non-radiological activities:

- There are no RCRA units associated with this survey unit.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Survey unit 28 comprises the southwest corner of the second floor. The baseline beryllium characterization of these rooms conducted by KH in 1999 found no removable



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beryllium contamination. Routine surveys found one sample collected in 2000 on top of a door alarm was positive for beryllium at the decision level of 0.2 ug/100 cm<sup>2</sup>. The door alarm was removed, and the area re-surveyed with no detectable beryllium found. Subsequent surveys following equipment removal have found no removable beryllium present in this survey unit. Prior to final encapsulation, the room was again surveyed. Sixteen (16) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm<sup>2</sup>.

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Non-radiological hazards have also been addressed in Survey unit 33, and the following summarizes the non-radiological activities:

- There are no RCRA units associated with this survey unit.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Survey unit 33 comprises the southwest corner of the second floor of 776, and none of the rooms in the survey unit were listed on the historical list of room with potential beryllium contamination. The baseline beryllium characterization of these rooms conducted by KH in 1999 found no removable beryllium contamination. Prior to final encapsulation, the room was again surveyed. Twelve (12) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm<sup>2</sup>.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 34. The following summarizes the non-radiological activities:

- There are no RCRA units associated with this survey unit.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. None of the rooms in this survey unit were listed on the historical list of rooms with potential beryllium contamination. The baseline beryllium characterization of these rooms conducted by KH in 1999 found no removable beryllium contamination. Prior to final encapsulation, the room was again surveyed. Seventeen samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm<sup>2</sup>.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey units 28, 33, and 34 has progressed to the point of reasonably achievable removal and no encapsulation would be required.

In summary, ALARA-based decontamination has been completed, Survey units 28, 33, and 34 will be surveyed for removable contamination and controls applied during demolition. This contact record will be placed in the demolition file to ensure the controls and requirements are included in the demolition work packages for these survey units.

This contact record also documents a clarification to the contact record prepared for survey unit 7. The contact record, dated January 17, 2005, indicated that the unit would be painted for encapsulation. Due to the low levels of contamination in survey unit 7, additional encapsulation is not required, and the unit will not be painted.

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**Contact Record Prepared By: Dyan Foss**

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